

South Dakota Department of Education

March 22 - 25, 2004

Scope of Review: The Student Achievement and School Accountability Programs (SASA) team monitored the South Dakota Department of Education (SDDOE) the week of March 22-25, 2004. This was a comprehensive review of the SDDOE's administration of Title I, Parts A and B of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act (NCLB).

In conducting its comprehensive review of Part A of Title I of ESEA, the SASA team carried out a number of major activities, including review and analysis of State assessments and State accountability system plans, review of the effectiveness of the State's instructional improvement and support measures to benefit LEAs and schools, and review of compliance with fiscal and administrative oversight required of the State educational agency (SEA). During the onsite review, the SASA team visited two local educational agencies (LEAs) – Rapid City School District (RCSD) and Todd County School District (TCSD) – and interviewed administrative staff, visited four schools that have been identified for improvement, and conducted a district-wide parent meeting in Fort Pierre. The team also interviewed administrators and a teacher in Pierre School District (PSD) regarding the provision of Title I services to eligible students attending private schools. The team then interviewed SDDOE personnel to confirm data collected from the LEAs in each of the three monitoring indicator areas. The team conducted conference calls to three additional LEAs upon its return to Washington, DC to confirm information gathered in RCSD, TCSD and in SDDOE.

In reviewing Part B of Title I, the SASA team examined the State request for proposals, State Even Start guidance, State indicators of program quality, and the most recent applications, local evaluations, and expenditure reports from the Even Start programs in Rapid City and Pierre. During the onsite review, the team visited two local Even Start programs -- Pierre and Rapid City -- where they interviewed administrative and instructional staff. Finally, the team interviewed the South Dakota Even Start State coordinator to confirm data collected at the two local sites and to discuss State administration issues. The team also reviewed maintenance of effort and other financial reports.

Previous Audit Findings: None to report.

Previous Monitoring Findings: The U.S. Department of Education (Department) last reviewed Title I Part A programs in South Dakota in March 1997 as part of a Federal integrated review initiative. SDDOE satisfactorily addressed all issues raised in the review in September 1997. The Department had not previously conducted a comprehensive review of the Part B program in South Dakota.

**Title I, Part A Monitoring
Summary of Critical Monitoring Elements**

Monitoring Area 1: Accountability			
Element Number	Description	Status	Page
Critical element 1.1	SEA has approved academic content standards for all required subjects or an approved timeline for developing them.	Met requirements	N/A
Critical element 1.2	The SEA has approved academic achievement standards and alternate academic achievement standards in required subject areas and grades or an approved timeline to create them.	Timeline waiver peer review scheduled for completion May 2004.	N/A
Critical element 1.3	The SEA has approved assessments and alternate assessments in required subject areas and grades or an approved timeline to create them.	Timeline waiver peer review scheduled for completion May 2004	N/A
Critical element 1.4	The SEA has implemented all required components as identified in its accountability workbook.	Met requirements	N/A
Critical element 1.5	The SEA has published an annual report card and ensured that LEAs have published annual report cards as required.	Met requirements Recommendation	5
Critical element 1.6	SEA indicates how funds received under Grants for State Assessments and related activities (§6111) will be or have been used to meet the 2005-06 assessment requirements of NCLB.	Met requirements	N/A
Critical element 1.7	SEA ensures that LEAs meet all requirements for identifying and assessing the academic achievement of limited English proficient students.	Met requirements	N/A

Monitoring Area 2: Instructional Support			
Element Number	Description	Status	Page
Critical element 2.1	The SEA designs and implements policies and procedures that ensure the hiring and retention of highly qualified staff.	Met requirements	N/A
Critical element 2.2	The SEA provides, or provides for, technical assistance for LEAs and schools as required.	Met requirements Recommendation Commendation	5
Critical element 2.3	The SEA establishes a Committee of Practitioners and involves the committee in decision making as required.	Met requirements Recommendation	6
Critical element 2.4	The SEA ensures that the LEAs and schools meet parental involvement requirements.	Met requirements	N/A
Critical element 2.5	The SEA ensures that schools and LEAs are identified for improvement, corrective action, or restructuring as required and that subsequent, required steps are taken.	Met requirements Recommendation	6
Critical element 2.6	The SEA ensures that requirements for public school choice are met.	Met requirements Recommendation	6
Critical element 2.7	The SEA fulfills the statutory requirements for the provision of supplemental educational services (SES).	Finding	6
Critical element 2.8	The SEA ensures that LEAs and schools develop schoolwide programs that use the flexibility provided to them by law to improve the academic achievement of all students in the school.	Met requirements Recommendation Commendation	7
Critical element 2.9	The SEA ensures that LEAs and schools develop and maintain targeted assistance programs that meet all required components.	Met requirements Recommendation	7

Monitoring Area 3: SEA Fiduciary responsibilities			
Element Number	Description	Status	Page
Critical element 3.1	The SEA ensures that its component LEAs are audited annually, if required, and that all corrective actions required through this process are fully implemented.	Met requirements	N/A
Critical element 3.2	The SEA complies with the allocation, reallocation, and carryover provisions of Title I.	Met requirements	N/A
Critical element 3.3	The SEA complies with the maintenance of effort provisions of Title I.	Met requirements	N/A
Critical element 3.4	The SEA ensures that the LEA complies with the comparability provisions of Title I.	Met requirements	N/A
Critical element 3.5	The SEA ensures that LEAs provide Title I services to eligible children attending non-public schools.	Findings	7
Critical element 3.6	The SEA has a system for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by the agency.	Met requirements Commendation	8
Critical element 3.7	The SEA has an accounting system for administrative funds that includes (1) State administration, (2) reallocation, and (3) reservation of funds for school improvement.	Met requirements	N/A
Critical element 3.8	The SEA has a system for ensuring fair and prompt resolution of complaints.	Met requirements	N/A
Critical element 3.9	The SEA ensures that the LEA complies with the rank order procedures for the eligible school attendance area.	Met requirements	N/A
Critical element 3.10	The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title I program requirements.	Met requirements Recommendation	9
Critical element 3.11	The LEA complies with the provision for submitting an annual plan to the SEA.	Met requirements Recommendation Commendation	9
Critical element 3.12	The SEA and LEA comply with requirements regarding the reservation of administrative funds.	Met requirements	N/A
Critical element 3.13	The SEA ensures that Title I funds are used only to supplement or increase non-Federal sources used for the education of participating children and not to supplant funds from non-Federal sources.	Finding	9

Title I Part A

Area: Accountability

1.5 – The SEA has published an annual report card and ensured that LEAs have published annual report cards as required.

Recommendation: The SASA team recommends that district level report cards be submitted to SDDOE for review prior to dissemination. Currently, required report card components are published by SDDOE and then disseminated to all districts. The district report card information includes the number and names of schools identified as in need of improvement. Districts then disseminate a district report card using the format provided from the State; however, districts can modify these reports. The SDDOE indicated that it does not currently review district report cards prior to their dissemination to parents.

Area: Instructional Support

2.2 – The SEA provides, or provides for, technical assistance for LEAs and schools as required.

Recommendation – Due to the critical relationship of curriculum alignment to improved student achievement in meeting the standards, the SEA should begin to provide technical assistance and professional development on the State’s content standards in at least the core content areas. When the curriculum is aligned to the State’s standards, teachers are able to provide instruction that targets specific knowledge and skills required to meet the State’s standards.

Commendation - School Support Teams, Technology Innovation in Education, the Midwest Alliance for Professional Learning and Leadership, Technology Quality Education grants, and the proposed Educational Service Units are examples of the SDDOE’s commitment to providing a wide range of technical assistance and professional development to LEAs with particular emphasis on schools in need of improvement. SDDOE recognizes the need to provide training to teachers regarding the delivery of instruction, as well as to principals to improve their ability to provide instructional leadership in their schools. Entire school teams engage in training, which contributes to consistency in practice throughout the school and across districts. These services are offered consistently throughout the State and are available to all schools; however, schools in need of improvement are given priority.

2.3 – The SEA establishes a Committee of Practitioners and involves the committee in decision making as required.

Recommendation – SDDOE should include a parent representative on the Committee of Practitioners who is not an employee of the system or a board member. Due to the size of the State and the distances required of members to travel to attend meetings, the SDDOE should also consider involving members via email, conference call, surveys by mail, etc., when input is needed. Such alternate arrangements will minimize time away from work and travel expenses.

2.5 – The SEA ensures that schools and LEAs are identified for improvement, corrective action, or restructuring as required and that subsequent, required steps are taken.

Recommendation – All schools, particularly those identified as in need of improvement, should immediately receive training in curriculum alignment in at least the core content areas. For rationale, see Recommendation under Indicator 2.2.

2.6 – The SEA ensures that requirements for public school choice are met.

Recommendation – South Dakota State law includes a provision for open enrollment for all students in the State. District and SDDOE staff informed the SASA team that, as a result, school choice under NCLB is rarely, if ever requested. Although parents are aware of the choice option, SDDOE must ensure that they are also advised that if they elect the choice option under NCLB, the cost of transportation is the school's responsibility, not the parents', as is the case with State-mandated open enrollment.

2.7 – The SEA fulfills the statutory requirements for the provision of supplemental educational services (SES).

Finding – Staff members at Todd Middle School in TCSD expressed dissatisfaction with the services provided by one of SDDOE's supplemental services providers. SDDOE staff informed the SASA team that they were aware of the issues. However, the SDDOE currently does not have a process in place to review performance of providers and remove them from the State's approved list.

Citation: 20 U.S.C. 6316 Section 1116(b)(4)(D) requires that the SEA develop, implement and publicly report on standards and techniques for monitoring the quality and effectiveness of the services offered by approved providers under this subsection, and for withdrawing approval from providers that fail, for 2 consecutive years, to contribute to increasing the academic proficiency of students served under this subsection.

Further action required: The SDDOE must amend its SEA application/request for proposals for SES providers and its administrative procedures to include provisions for monitoring the progress of its service providers and the process for removal of a provider from the State-approved list, if necessary.

2.8 – The SEA ensures that LEAs and schools develop schoolwide programs that use the flexibility provided to them by law to improve the academic achievement of all students in the school.

Recommendation – In South Dakota, schoolwide program schools do not consolidate funds into a single schoolwide account, as encouraged under NCLB. The SDDOE informed the SASA team that since the schoolwide program is implemented in a way that benefits all students, consolidation of funds is not needed. The SDDOE is encouraged to review its policies and modify or eliminate barriers to consolidation of funds so schools can maximize resources in schoolwide programs.

Commendation - SDDOE requires each school to develop a school improvement plan that contains elements that are compatible with the components required for schoolwide programs. Schools identified for improvement in South Dakota operate under one coordinated plan that incorporates the requirements of both schoolwide plans and school improvement plans.

2.9 – The SEA ensures that LEAs and schools develop and maintain targeted assistance programs that meet all required components.

Recommendation: Reading Recovery is offered in some targeted assistance schools, and the Reading Recovery assessment is used to identify eligible students. The SEA should monitor LEAs to ensure that schools are using multiple measures to identify eligible children in targeted assistance schools (TAS) to ensure that a broad assessment of students' need is made. The SDDOE should also examine the use of Title I paid staff to ensure reduction of pullout services. This will ensure that students do not miss significant time from classes that provide the core curriculum.

Area: Fiduciary

3.5 - The SEA ensures that LEAs provide Title I services to eligible children attending non-public schools.

Finding: The Federal Programs director in TCSD informed the SASA team that the Title I program for eligible private school children in the LEA was planned, designed and implemented by teachers in the employ of the private school. TCSD officials provide the private school with instructional materials and supplies equal to the amount generated by children from low-income families. TCSD officials also provide the private school with resources for staff development.

Citation: U.S.C. 6320 Section 1120(d)(2) requires the provider of Title I services to eligible private school children to be an employee of the LEA or an employee of a contractor hired by the LEA. Simply providing the private school with instructional materials and supplies is not an option available to the LEA because it is neither a

proper Title I program implemented by the LEA nor does it meet the equitability requirement of Section 1120.

Further action required: SDDOE must ensure that TCSD and all its LEAs, after consultation with appropriate private school officials, design a Title I program that meets the needs of the private school participants. LEAs may not delegate this responsibility to the private schools or their officials. In addition, LEAs, in consultation with private school officials, must determine what challenging content and student achievement standards will apply and how the LEA will annually assess the progress of the Title I program toward meeting the agreed-upon standards.

SDDOE should make its LEAs aware that Title I funds used for professional development activities for private school teachers of Title I participants must be used to help these teachers teach Title I students better. It is not allowable to use these funds to upgrade the instructional program in the regular classroom of the private school. (Section 200.66 of the Title I regulations.)

Finding: Administrators and a teacher in PSD informed the SASA team that for the past eight years the only instructional program offered to eligible private school students by PSD is Reading Recovery. These individuals also informed the SASA team that minimal consultation with appropriate private school officials occurred, “little discussion is required, as we’re doing what we’ve done before,” and “they know that this is the program we offer.”

Citation: Section 200.63 of the Title I regulations requires an LEA to consult during the design and development of the Title I program for eligible private school students. A required topic of consultation is a determination of how the needs of the eligible private school children will be identified. A unilateral offer of services by an LEA with no opportunity for discussion is not adequate consultation. The needs of the private school participants determine the Title I program.

Further action required: SDDOE must ensure that PSD meets the extensive consultation requirements of the Title I statute and regulations, that the consultation includes meetings of the LEA and private school officials, and that consultation must occur before the LEA makes any decision that affects the opportunities of eligible private school children to participate. These meetings must continue throughout the implementation and assessment of Title I services.

3.6 - The SEA has a system for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by the agency.

Commendation: SDDOE’s Student Information Management System (SIMS) was developed to ensure accurate and timely submission of data to SDDOE and data transfer between LEAs, including student enrollment, child counts and other critical data. SDDOE’s State website includes a section on SIMS which offers an online tutorial, data definitions, and dates for required student and district data submissions. Administrators

in both of the LEAs visited described SIMS as easy to understand and to operate, enabling a statewide data management process that links all entities – schools, LEAs and SDDOE.

3.10 - The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title I program requirements.

Recommendation: The SDDOE should supplement its five-year onsite monitoring cycle with some mechanism that will enable it to identify emerging or potential compliance issues in intervening years. Use of self-evaluations or expanded annual plan requirements could enable SDDOE to collect additional implementation data from LEAs during ‘off cycle’ years.

3.11 - The LEA complies with the provision for submitting an annual plan to the SEA.

Recommendation: When reviewing individual school budgets and justifications as part of the LEA application process, LEA administrative staff should compare proposed school budgets against their needs assessments and the goals set forth in the schoolwide plans to ensure that budgets support schools’ identified needs. It is particularly important that budgets for schools identified as in need of improvement support school goals and address areas where the schools failed to make AYP.

Commendation: SDDOE has developed a statewide system of plan application and approval that includes technical assistance that supports LEAs in developing comprehensive and accurate plans, resulting in smooth transition between school years. SDDOE ensures there is no interruption of programs and services through a streamlined plan approval process and timely release of funds.

3.13 - The SEA ensures that Title I funds are used only to supplement or increase non-Federal sources used for the education of participating children and not to supplant funds from non-Federal sources.

Finding: PSD has established a goal of providing a Reading Recovery program in each of its four elementary schools. In the LEA’s non-Title I school the program is paid for with general funds. In the three elementary schools operating Title I TAS programs, the Reading Recovery program is paid for with Title I funds. PSD is supplanting its allocated Title I funds by using local and State funds to provide the program in the non-Title I school and funding the same program in the Title I schools with Title I funds.

Citation: 20 U.S.C. 6321 Section 1120A(b) states, “A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from non-Federal sources for the education of pupils participating in programs assisted under this part, and not to supplant such funds.”

Further action required: SDDOE must ensure that all LEAs in the State use their Federal funds under Part A of Title I only to supplement the funds that would, in the absence of such Federal funds, be made available from non-Federal sources for the education of pupils participating in programs assisted under this part, and not to supplant such funds. SDDOE must require PSD to fund the Reading Recovery program in all of its elementary schools with general funds.

**Title I, Part B Monitoring
Summary of Critical Monitoring Elements**

Monitoring Area 1: Accountability			
Element Number	Description	Status	Page
Critical element 1.1	SEA complies with the subgrant award requirements.	Met requirements	N/A
Critical element 1.2	In making non-competitive continuation awards, the SEA reviews the progress of each subgrantee in meeting the objectives of the program and evaluates the program based on the indicators of program quality.	Finding	
Critical element 1.3	The SEA requires applicants to submit applications for subgrants with the necessary documentation.	Met requirements	N/A
Critical element 1.4	The SEA complies with statutory requirements in refusing to award subgrant funds to eligible entities.	N/A	N/A
Critical element 1.5	The SEA develops, based on the best available research and evaluation data, indicators of program quality for Even Start programs.	Met requirements	N/A
Critical element 1.6	The SEA uses the indicators of program quality to monitor, evaluate, and improve local programs within the State.	Finding	
Critical element 1.7	The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Even Start program requirements.	Met requirements	N/A
Critical element 1.8	The SEA ensures that projects provide for an independent local evaluation of the program that is used for program improvement.	Finding	

Monitoring Area 2: Instructional Support			
Element	Description	Status	Pg.
Critical element 2.1	The SEA uses funds to provide technical assistance to local programs to improve the quality of Even Start family literacy services.	Met requirements	N/A
Critical element 2.2	Each program assisted shall include the identification and recruitment of families most in need.	Met requirements	N/A
Critical element 2.3	Each program shall include screening and preparation of parents and enable those parents and children to participate fully in the activities and services provided.	Met requirements	N/A
Critical element 2.4	Each program shall be designed to accommodate the participant's work schedule and other responsibilities, including the provision of support services, when those services are unavailable from other sources.	Met requirements	N/A
Critical element 2.5	Each program shall include high-quality, intensive instructional programs that promote adult literacy and empower parents to support the educational growth of their children, and in preparation of children for success in regular school programs.	Finding	9
Critical element 2.6	All instructional staff of the program hired after enactment of NCLB (January 8, 2002), whose salaries are paid in whole or in part with Even Start funds, meet the Even Start staff qualification requirements.	Finding	10
Critical element 2.7	By December 21, 2004 a majority of the individuals providing academic instruction shall have obtained an associate's, bachelors, or graduate degree in a field related to early childhood education, elementary school or secondary school education, or adult education.	N/A	N/A
Critical element 2.8	By December 21, 2004 if applicable , a majority of the individuals providing academic instruction, shall meet the qualifications established by the <u>State</u> for early childhood education, elementary or secondary education, or adult education provided as part of an Even Start program or another family literacy program.	N/A	N/A

Critical element 2.9	By December 21, 2004 , the person responsible for administration of family literacy services will have received training in the operation of a family literacy program.	N/A	N/A
Critical element 2.10	By December 21, 2004 , paraprofessionals who provide support for academic instruction will have a secondary school diploma or its recognized equivalent.	N/A	N/A
Critical element 2.11	The local programs shall include special training of staff, including child-care workers, to develop the necessary skills to work with parents and young children.	Recommendation	N/A
Critical element 2.12	The local programs shall provide and monitor integrated instructional services to participating parents and children through home-based programs.	Met requirements	N/A
Critical element 2.13	The local programs shall operate on a year-round basis, including the provisions of some program services, including instructional and enrichment services, during the summer months.	Met requirements	N/A
Critical element 2.14	The local program shall be coordinated with other relevant programs under the Adult Education and Family Literacy Act, the Individuals with Disabilities Act, and Title I of the Workforce Investment Act of 1988 and the Head Start program, volunteer literacy programs, and other relevant programs.	Met requirements	N/A
Critical element 2.15	The local programs shall use instructional programs based on scientifically based reading research for children and adults.	Recommendation	N/A
Critical element 2.16	The local program shall encourage participating families to attend regularly and to remain in the program a sufficient time to meet their program goals.	Met requirements	N/A
Critical element 2.17	The local programs shall use reading-readiness activities for preschool children based on scientifically based reading research.	Recommendation	N/A
Critical element 2.18	The local program shall, if applicable, promote the continuity of family literacy to ensure that individuals retain and improve their educational outcomes.	Met requirements	N/A
Critical element 2.19	Families are participating in all core instructional services.	Finding	11

Monitoring Area 3: SEA Fiduciary responsibilities			
Element Number	Description	Status	Page
Critical element 3.1	The SEA complies with the allocation requirements for State administration and technical assistance, and award of subgrants.	Met requirements	N/A
Critical element 3.2	The SEA ensures that subgrantees comply with statutory and regulatory requirements on uses of funds and matching.	Met requirements	N/A
Critical element 3.3	The SEA complies with the cross-cutting maintenance of effort provisions.	Met requirements	N/A
Critical element 3.4	The SEA ensures that the Even Start subgrantee partnership provides Even Start services to eligible elementary and secondary school students attending non-public schools.	Finding	N/A
Critical element 3.5	The SEA has a system for ensuring fair and prompt resolution of complaints.	Met requirements	N/A
Critical element 3.6	The local projects comply with the remaining equitable participation provisions under sections 9501-9506, ESEA.	Finding	12

Title I Part B – Even Start

Area: Accountability

1.2 – Use of State Indicators for Making Non-Competitive Continuation Awards

Finding: During discussions with SEA staff, the SASA team learned that the State is not using its indicators of program quality to determine if subgrantees are making sufficient progress in meeting the objectives of the program and to make decisions about non-competitive continuation awards. The Even Start State coordinator requested and was given advice about how to obtain technical assistance to refine the use of indicators in the State.

Citation: 20 U.S.C. 6381g Section 1238(b)(3) requires States to use their indicators of program quality to determine if projects are making sufficient progress and to make decisions about continuation awards.

Further Action Required: The SEA must develop a plan for using the State indicators of program quality to determine if projects are making sufficient progress and to make decisions about non-competitive continuation awards.

1.6 – Other Uses of State Indicators of Program Quality

Finding: During discussions with SEA staff, the ED team learned that the State is not using its indicators of program quality to monitor, evaluate, and improve the Even Start program within the State.

Citation: 20 U.S.C. 6381i Section 1240 requires the State to use the indicators of program quality to monitor, evaluate, and improve Even Start programs within the State.

Further Action Required: The State must develop a plan for using the indicators of program quality to monitor, evaluate, and improve Even Start programs within the State. The State may use some of the funds it reserves under Section 1233(a) for this purpose.

1.8 – Independent Local Evaluation

Finding: The local evaluation reports reviewed by the ED team did not include information that would make the evaluation useful for program improvement purposes. Neither report included data on participant outcomes, and one of the reports did not include any recommendations for program improvement.

Citation: 20 U.S.C. 6381d Section 1235(15) requires SEAs to ensure that projects provide for an independent local evaluation of the Even Start program that is used for program improvement.

Further Action Required: The SEA must provide ED with a plan for ensuring that local evaluation reports include data that can be used for improvement purposes and recommendations from the evaluator suggesting improvements as needed.

Area: Instructional support

2.5 – High-Quality Intensive Instructional Programs

Finding: The Even Start project in Pierre did not include early childhood educational services that were of high quality or of sufficient intensity, and the program was therefore unlikely to result in preparing children for success in school. Project staff were under the mistaken impression that children could only participate in early childhood services at the same time their parents were participating in adult education. As a result, most children participated in early childhood services only a few hours a week and many of the services were not educational.

Citation: 20 U.S.C. 6381d Section 1235(4) requires each Even Start program to include high-quality, intensive instructional programs that support the educational growth of children to prepare them for success in the regular school program.

Further Action Required: The SEA must develop a plan to assist the Pierre Even Start project in providing intensive high-quality early childhood education services to all the children in the project.

2.6 – Qualified Staff

Finding: Three of the staff in the Rapid City Even Start project hired since January 8, 2002, whose salaries are paid with Even start funds, did not meet the statutory requirements for instructional staff. Two of the instructors did not have an Associate's degree, and one of the staff had a Bachelor's in Art, which is not an area related to early childhood education.

Citation: 20 U.S.C. 6381d Section 1235(5) requires new instructional staff in each Even Start program, whose salaries are paid in whole or in part with Even Start funds, to have, at a minimum, an Associate's degree in an area related to the area in which they are teaching.

Further Action Required: The SEA must immediately assist the Rapid City Even Start program in hiring instructional staff for the early childhood component of the program. The qualified teacher may supervise the other staff that are supporting the instruction.

Indicator 2.11 – Special training of project staff.

Recommendation: The Even Start project in Pierre was allowing staff to attend national family literacy conferences, but did not seem to have a system of high-quality professional development in place. Projects should provide intensive, classroom-focused,

on-going professional development based on scientific research to improve the quality of educational services in addition to offering opportunities for local staff to attend national conferences.

Indicators 2.15 and 2.17 – Activities based on scientific research

Recommendation: The Even Start projects in Pierre and Rapid City did not base all core instructional services on scientific research. For example the early childhood component in the Even Start project in Pierre did not include a coherent program of educational services. Staff in the Rapid City project shared the research base for portions of the parenting education program, but this research did not appear to have been published in a peer-reviewed journal. Local projects should use the statutory definition of scientifically based reading research to ensure that instructional activities and services are based on scientific research. The State coordinator should provide training in this area for local project staff.

Indicator 2.19 – Family members are participating in all four core instructional components.

Finding: At the local project in Pierre, some children were not participating in early childhood education. At the Rapid City project, some parents were participating in computer training, but they were not enrolled in adult education or parent literacy training.

Citation: 20 U.S.C. 6381d Section 1235(2) requires screening and preparation of parents and children to enable those parents and children to participate fully in the activities and services provided by the Even Start program. The definition of “family literacy services” in Section 9101(20) requires four instructional components, including parent literacy training that leads to economic self-sufficiency and an age-appropriate education to prepare children to succeed in school.

Further Action Required: The SEA must ensure that all families enrolled in local Even Start projects are enrolled in high-quality and intensive adult education or parent literacy training, early childhood education, interactive literacy activities between parents and their children, and training for parents on how to be the primary teacher for their children and full partners in the education of their children.

Indicators 3.4 and 3.6 – Equitable participation of private school children

Finding: Neither local Even Start project visited was aware of the requirement to provide timely and meaningful consultation with private school officials and Even Start services on an equitable basis for eligible school-age private school students and their teachers.

Citation: 20 U.S.C. Section 9501 and 20 U.S.C. 7884 Section 9504 of NCLB require recipients of Federal funds to provide eligible school-age children who are enrolled in private elementary and secondary schools, and their teachers or other educational

personnel, educational services and benefits under those programs on an equitable basis. Eligible entities must provide the equitable services after timely and meaningful consultation with the appropriate private school officials.

Further Action Required: The SEA must ensure that all Even Start projects meaningfully consult with private school officials in order to provide Even Start services and benefits to eligible private school students and their teachers or other educational personnel on an equitable basis.